

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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4	HOSPIRA, INC.,) Docket Nos. 16 C 651	
5	Plaintiff,		17 C 7903
6	vs.		
7	FRESENIUS KABI USA, LLC,) Chicago, Illinois	
8	Defendant.		July 19, 2018
9		10:13 a.m.	

VOLUME 4A
TRANSCRIPT OF PROCEEDINGS - Bench Trial
BEFORE THE HONORABLE REBECCA R. PALLMEYER

APPEARANCES:

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	Also Present:	Mr. Michael P. Bauer, Hospira
		Mr. Ryan Daniel, Fresenius Kabi
		Mr. Ali Ahmed, Fresenius Kabi

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1 THE COURT: Sorry to keep you waiting.

2 I think we are ready to get started with the
3 plaintiff's case-in-chief.

4 MR. LYERLA: Your Honor, we call Mr. Chris Seaton.

5 THE COURT: Mr. Seaton, could you step forward,
6 please, sir.

7 Sir, can I ask you to raise your right hand.

8 ROBERT CHRISTOPHER SEATON, PLAINTIFF'S WITNESS, SWORN

9 DIRECT EXAMINATION

10 BY MR. LYERLA:

11 Q. Good morning, Mr. Seaton.

12 A. Good morning.

13 Q. For the record, would you state your full name and spell
14 it for the court reporter.

15 A. Robert Christopher Seaton, S-e-a-t-o-n.

16 Q. So you have in front of you a book of exhibits.

17 Would you please turn to JTX143.

18 A. Yes, sir.

19 Q. Do you recognize that document?

20 If it decides to come apart, the pages fall all
21 over the place and it is quite a mess, but that one stayed
22 together.

23 So I was directing your attention -- take your
24 time.

25 I was directing your attention to JTX143. That's a

1 recent copy of your curriculum vitae, correct?

2 A. Yes, sir.

3 Q. All right. Feel free to refer to it. I am going to ask
4 you some other questions, but feel free to refer to your CV,
5 if it's helpful to your testimony.

6 Can you begin by telling me about your educational
7 background, beginning with college.

8 A. Yes. I have an undergraduate degree, an Honours
9 Bachelor of Commerce from McMaster University. That's a
10 finance and accounting degree.

11 And I have a master's in business administration,
12 also from McMaster University in Hamilton, Ontario.

13 Q. Can you tell us about the various past and current
14 professional positions that you have held.

15 A. Yes, sir. I think I have a slide for that.

16 MR. LYERLA: Can we see the slide, please.

17 Thank you.

18 BY MR. LYERLA:

19 Q. Feel free to refer to the slide and tell us about
20 your -- give us a high-level description of the positions you
21 have held over the years, please.

22 A. On graduation from university, I was recruited by
23 General Electric in Canada, into their financial management
24 program, and then subsequently into a number of financial
25 positions. I was with them for four years.

1 And then left them to join Miles Canada. Miles
2 Canada was a Bayer or Bayer subsidiary at the time. I was
3 with Miles for six years in positions ranging from senior
4 financial analyst through to controller for the
5 pharmaceuticals division.

6 In '98 -- in '88 -- I'm sorry -- I left Miles to
7 join Imperial Chemical Industries in the pharmaceuticals
8 business. That pharmaceuticals business has, over the years,
9 been spun out of ICI and become now AstraZeneca, one of the
10 larger pharmaceutical companies.

11 I was with ICI from 1988 to 1995 in Canada, in the
12 U.S., and in the U.K. And for part of that time, I moved out
13 of pharmaceuticals into their chemicals and polymers
14 division.

15 I think at the end I was the senior finance person
16 for one of their global businesses inside chemicals and
17 polymers.

18 I moved back to the U.S. in 1995 and joined Bayer
19 as the vice president of business planning and finance for
20 the North American pharmaceuticals business.

21 I then became, subsequently, senior vice president
22 for the global pharmaceuticals business, in charge of
23 licensing, acquisitions, and business development.

24 Following our merger with Schering AG, I became
25 senior vice president of global transactions for the

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